QWEST'S RESPONSE TO THE

QWEST/ESCHELON OP-5 DATA RECONCILATION REPORT

PREPARED BY CAP GEMINI ERNST & YOUNG (CGE&Y)

DATED OCTOBER 25, 2002

November 11, 2002

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When taken in the full context, the results of the CGE&Y data reconciliation do nothing to change the fact that OP-5 remains a reasonable indicator of new service installation quality. In fact, the difference between the OP-5 result reported by Qwest (92.17%) and the recommended result that CGE&Y believes it should report (91.64%) differ by a mere 0.53%.[2] Nevertheless, Qwest is in the final steps of implementing improvements to OP-5 that address the findings and recommendations in CGE&Y's report. These improvements will be in place by the end of the year or sooner.

Aside from this, the CGE&Y report has serious flaws that should not be permitted to detract from the important facts in relation to Qwest's 271 Application. These facts are, that in the context of the OSS test, the performance measurement audit, what OP-5 is known to report (in light of both the limitations previously known and those discussed in CGE&Y's report), and the additional data Qwest has provided, OP-5 continues to be a reasonable indication of new service installation quality.

Qwest acknowledges that Staff and CLECs are interested in several of the issues in CGE&Y's report that go beyond what Qwest is asserting OP-5 was

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1 In addition to comments, Qwest has proposed corrections to be made to the report and has provided those in Attachment-1.

2 As referenced in Table 6.2 of the report, comparing Qwest's reported result with CGE&Y's recommended OP-5A (which it characterizes as being defined per Qwest's current OP-5, but excluding repeat reports). Even when comparing the Qwest reported result with that yielded by CGE&Y's strict interpretation of the PID continues to show the same conclusion of parity.

defined to cover. At minimum, it appears there have been misunderstandings as to what precisely OP-5 is intended to capture. Nevertheless, it is even more clear what Qwest's OP-5 results do represent and what they do not represent. If CGE&Y's data reconciliation report does nothing else, it does demonstrate that, in its own end analysis, OP-5's results are a good indicator of the quality of *installation* – i.e., as shown by CGE&Y's own proposed OP-5A result. Add to that Qwest's pending improvements to OP-5, which eliminate nearly all the issues raised in CGE&Y's report, and the right conclusion is clear: it is time to move on, to successfully close the Arizona evaluation of Qwest's 271 Application and to proceed in the broader collaborative to continue the efforts that will go on, post-271, to refine current and emerging matters of interest.

In the mean time, the impact of these questions on actual OP-5 results (i.e., results per CGE&Y's OP-5A) is minimal and, with few exceptions, the rest of the issues are almost totally answered by Qwest's voluntary additional data via PO-20 and the results reported under Service Order Accuracy via Call Center Data[3] –until such time as the parties in the broader collaborative can agree on ways to replace these.

I. THE OP-5 MEASUREMENT, WITH ITS KNOWN LIMITATIONS, CONTINUES TO BE A REASONABLE INDICATOR OF NEW SERVICE INSTALLATION QUALITY.

The CGE&Y report addresses OP-5 limitations that are of the same type and scope as others already known to exist or have no unacceptable effects on the conclusions OP-5 supports. Moreover, the limitations are, at this point, temporary. The fact that the reported results and recommended results are comparatively similar

(the 0.53% referenced above) supports the original decision of the PID collaborative to accept OP-5 with limitations not unlike those observed in CGE&Y's report. The parties were satisfied that the effects of these kinds of limitations could be reasonably expected either (1) to offset each other or (2) to conservatively imply worse-than-actual service quality (i.e., adverse to Qwest), while still presenting a reasonable indication of new service installation quality in the context of the parity standard. CGE&Y's observations are consistent with this perspective and simply confirm the reasonableness of the decision of the collaborative in accepting the OP-5 definition despite circumstances that limit it.

A. In the Context of the Origins of OP-5, the Limitations Found by CGE&Y Are Not Unlike Other Known Limitations.

The PIDs were developed in the context of the legacy systems from which most of the PID data are obtained. During PID development, the parties discussed the limitations in the PIDs, which were typically the result of legacy system realities. Given the data provided by those systems, the PID collaborative appropriately focused on defining measurements to calculate results from that data.

The OP-5 PID is, and always has been, based on trouble reports (the traditional I-Reports) from the maintenance and repair systems. The parties discussed at length how to accurately capture the information produced by the PID in OP-5's title and, based on those extended discussions, specifically decided to name the it, "New Service Installation Quality," instead of just "New Service Quality."

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[3] Found in Qwest's results reports from July 2002 data and afterward on the page following the PO-20 results.

Accordingly, the parties were acknowledging that OP-5 focuses on the quality of provisioning service, not the accuracy of order writing.

B. Qwest is improving OP-5.

Since OP-5 was first developed, advancements in capabilities have made improvements possible for OP-5. Qwest is in the final steps of further improvements to its OP-5 measurement by enabling the PID's reporting process to eliminate the effects of upstream limitations in systems. With the November 2002 results (reported in December 2002), Qwest will implement a new capability to refine the identification of OP-5-qualified trouble reports and link them with specific new installation orders, as follows:

- Instead of reporting I-Reports[4] as a percentage of average monthly new service installation volume, OP-5 will now tie trouble reports with specific orders in the denominator, such that OP-5 will become a more direct measurement (rather than just an estimator) of new service installation quality.
- In conjunction with the above linking of trouble reports and orders, OP-5 measurement programming will determine the installation-related nature of the trouble, based on criteria consistent with the PID, without being dependent on LMOS logic.
- The new OP-5 process will identify those orders with an associated, valid Qwest trouble ticket. Once an order is so identified, that trouble ticket will be reported in the numerator of the OP-5 calculation in accordance with the PID.
  - The programming will count only a single occurrence of valid trouble, eliminating the observed problem with repeat repair reports being counted.
  - The programming will also evaluate the sequence of trouble tickets, looking for and evaluating all instances of valid Qwest trouble, while passing over (not counting) intervening non-Qwest troubles and counting subsequent valid Qwest caused troubles.
- The new OP-5 programming will execute in a reporting mode (after-the-fact, as opposed to near real-time) and will be doing the match between the order and

[4] Installation Reports.

related trouble tickets. As a result, the issue of delays in the completion of an order in the legacy systems will be eliminated.

- The OP-5 reporting process will use the completed order as the starting point in the trouble ticket/order matching process. As a result, those tickets impacted by the interval to update LMOS will use the carrier information of the order to avoid problems in correctly identifying tickets/orders as wholesale or retail.

These changes, with related details, will mitigate or eliminate limitations previously known and found in the data reconciliation. Qwest recognizes that at least some of these changes may require PID changes, which will be presented to Long-Term PID Administration (LTPA) for acceptance while, in parallel, informational reporting will begin on the schedule set forth above. Nevertheless, as reiterated throughout these comments, OP-5 remains a reasonable indicator of new service installation quality, based on what it is known to measure today.

II. THE ISSUES CGE&Y RAISES ARE EXPLAINED BY A FEW ROOT CAUSES.

While it may appear that CGE&Y has raised many separate issues throughout the report, these issues can be traced to just a few root causes. These root causes are fully discussed below, along with the CGE&Y issues they help answer.

A. Root Cause: LMOS Limitations

Almost all of the CGE&Y-identified technicalities are explained by two historical limitations in the legacy system called "LMOS."[5] These two limitations are (1) LMOS' flagging of installation-related orders (regardless of ineligible order types, such as whether the order is for inward line activity) and (2) timing delays related to batch processing in updating orders in LMOS. These two limitations, explained below,

[5] Loop Maintenance Operation System.

account for issues addressed in CGE&Y's report in Sections 2.3, 2.4, 2.5.1, 2.5.2, 2.5.3, and 2.7 (i.e., 6 out of 7 sections on issues) and recommendations in Sections 6.1, 6.2, 6.4, and 6.5 (i.e., 4 out of 6 sections on recommendations).

The I-Reports upon which OP-5 calculations have been based are first identified as installation-related in the LMOS maintenance system. As noted in the CGE&Y report, LMOS uses a set of business rules to set the installation-related flag on non-designed[6] services.[7] This information is then passed to MTAS,[8] which is the direct source of data for OP-5 and other maintenance and repair measurements for non-designed services.

LMOS treats trouble reports the same way on both the wholesale and retail sides. Accordingly, these particular findings are not deficiencies of measurement programming, which remains PID-compliant. Rather, they describe factors associated with inherent limitations caused by the way legacy systems process trouble reports. As for the impact on results, there is no impact on the effectiveness of the measurement in indicating new service installation quality.

1. Explanations and Related Report Issues

Identification of Installation-related Trouble Reports

The I-flagging process referenced above has existed in LMOS and MTAS since before the PIDs were developed, and explains what CGE&Y observed in sections 2.3, 2.4, 2.5.2, and 2.5.3, where it noted that OP-5 does not capture, respectively,

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6 Non-designed services include POTS services and services that do not require the use of engineering/design resources for installation.

7 There is no analogous situation for designed services, for which the data source is WFA. Hence, the issues related to this limitation affect only non-designed services.

8 Maintenance Trouble Administration System.

repeat reports, trouble reports beyond the first following new installation, installation troubles where an eligible order is followed by an ineligible order, and troubles related to orders with no inward order activity. In addition, this limitation deals with CGE&Y's recommendations in sections 6.1, 6.2, and 6.4.

Qwest's pending improvement to OP-5 eliminates these issues and recommendations entirely, by removing dependence of OP-5 programming on LMOS processing and data.

Timing Delays in Updating Order Completions in LMOS

The OP-5 PID excludes, "Trouble reports on the day of installation before the installation work is reported by the technician/installer as complete." This relates to the fact that Qwest's systems must "know" the work is complete in order for a mechanized measurement such as OP-5 to be able to record it as installation-related. When the language in the OP-5 PID was added about capturing troubles "including on the day the order is installed," Qwest ensured that calls to its interconnect service center (ISC) generated trouble tickets, where the provisioning systems reflected the work was completed. However, unless, consistent with what the PID states, the "work is reported . . . as complete" in LMOS, the trouble ticket cannot be identified, mechanically, as new installation-related. Hence, this remained a limitation in LMOS that prevented OP-5 from completely capturing all trouble reports on the day of installation occurring after physical provisioning of the service but before the order is updated as complete in LMOS.

This limitation explains what CGE&Y reported in sections 2.5.1, and 2.7, and deals with its conclusions/recommendations in sections 6.1, 6.4, and 6.5.[9] As

[9] This explanation also addresses CGE&Y's Observation 3 in section 7.

explained above, in its current state, OP-5 remains a reasonable indicator of new service installation quality. Qwest's pending improvements to OP-5 will enable it to capture such tickets, effectively eliminating these issues.

2. Detailed Comments on Specific Issues/Recommendations.

Sections 2.3 and 6.2. CGE&Y refers to 9 trouble reports in this section. Qwest agrees these troubles were repeat reports and were correctly included in MR-7. Repeat reports following an installation report within 30 days would not be flagged as installation. The intent behind the OP-5 measurement is to reflect the percentage of new installations that are trouble free within the first 30 days of service. As such, counting multiple occurrences of trouble on the same line is inconsistent with the measure's intent. In the context of OP-5's development, as explained herein, CGE&Y's representation that these 9 reports were *excluded* in error is not correct. They were *not*, in fact, "excluded" by Qwest's OP-5 measurement coding; but rather were simply not in the data stream of long-standing LMOS data streams relating to I-Reports on which OP-5 was based. In any event, the point is nearly moot, as Qwest agrees with CGE&Y's recommendation in section 6.2 that repeat reports be excluded from the OP-5 measurement.

Section 2.4. CGE&Y disputes 12 instances where MTAS did not flag the trouble as installation related. Five were related to 10xx, 12xx, and 13xx disposition codes (see response to disposition codes below). Two were related to lack of process adherence, one was related to subsequent orders not labeled as installation orders, one was not completed in LMOS before the trouble ticket was initiated, and three tickets were agreed upon by CGE&Y and Qwest as non-Qwest related. CGE&Y states, "Qwest explained that LMOS only flags the first trouble within 30 days of an inward

installation . . . ." To be clearer, LMOS flags more than just troubles related to inward installation. Thus, while current OP-5 measurement coding does nothing contrary to the PID specifications on this point, the data flows from LMOS have historically limited Qwest's ability to strictly limit the installation-related troubles to those associated with inward line activity orders. This works conservatively against Qwest, without necessarily harming the measurement's capability to reflect whether new service installation quality is at parity with retail.

CGE&Y's recommendations, 6.4 and 6.5, relating to this point are unavoidably *not* necessary, because they are based on the current construct, which is precisely the situation in which OP-5 experiences its historical limitations. Qwest's improvements, which address these concerns, eliminate the situation, which eliminates the need for CGE&Y's recommendations on this matter.

Section 2.5.1. CGE&Y refers to 6 trouble reports that Qwest classified as CLEC-related, of which one was incorrectly so classified. CGE&Y then goes on to claim that "this trouble should be eligible for OP-5." However, in so saying, CGE&Y ignores the fact that this trouble was an LSR/Service Order mismatch, not an installation trouble (see comments later in this response addressing service order accuracy). While it might fit CGE&Y's OP-5C recommendation in Section 6, it is not what CGE&Y admits is the currently defined OP-5 (which, without repeat reports, constitutes CGE&Y's OP-5A recommendation). Moreover, this ticket is covered by the results Qwest has voluntarily added in its results reports beginning with July 2002 data addressing Service Order Accuracy from Call Center data (found in results reports on the page following PO-20 Service Order Accuracy results).

Section 2.5.2. CGE&Y points to two troubles for which additional order activity occurring between the time a particular inward line activity completes and the first trouble report following that activity. Where the intervening order was of a non-inward type, the trouble report was related to it, rather than to the earlier inward order, and was thus not counted as being eligible for OP-5. This is correct. However, as the small incidence of troubles indicates, and as the de minimis impact on results demonstrates, this is an insignificant limitation caused by LMOS processing. In any event, Qwest's improvement to OP-5 measurement processing will eliminate this problem.

Sections 2.5.3 & 2.5.4. As another limitation related to LMOS processing, OP-5 has included some troubles related to orders with no inward activity. Working in the opposite – and thus, offsetting – direction to other limitations, this situation results in *understating* OP-5 quality. So, while CGE&Y found "8 troubles" inappropriately *excluded* earlier in section 2.5, it found 10 troubles *included* in error because they were related to orders with no inward activity. Again, on the whole, these are limitations that have no significant impact on OP-5 results, and Qwest's improvements to the measurement will resolve the issue. These are the kinds of offsetting effects among limitations that helped the parties accept the current OP-5.

Section 2.7. Identifying troubles as retail or wholesale revolves around *when* Qwest's systems – again, LMOS, for non-designed services – can record the customer as having become a CLEC customer. This issue is related to several other issues discussed above, which depend upon LMOS "knowing" that installation work has been completed, by the time an installation-related trouble ticket arrives. Looking again at the overall impact of these issues, the effect on OP-5 results is not significant.

Nevertheless, Qwest's improvement to OP-5 processing will remove its dependence on LMOS, which could not be done when OP-5 was originally developed, and thus, resolve this problem.

Section 6.4. The capability to correlate troubles to service orders has not existed in the past. Only recently, has Qwest had available the necessary functionalities to make it possible. Accordingly, this is a central aspect in Qwest's improvement of OP-5.

Section 6.5. The proposed correction tracking is not necessary, even under the present OP-5 regime. Nevertheless, because Qwest's upcoming improvement to OP-5 will eliminate the concern, the question will be moot by the time it could be implemented.

B. Root Cause: CGE&Y's Misunderstanding of Disposition Codes

Some of CGE&Y's issues are explained simply by its misunderstanding of the purpose of the "10xx," "12xx," and "13xx" series of disposition codes. Disposition codes are used to indicate what is done with trouble reports and are useful in determining eligibility for OP-5. This misunderstanding explains CGE&Y's findings in sections 2.6 and portions of its conclusions/recommendations in sections 6.1 and 6.6, as well as various other references.

1. Explanation and Related Report Issues

It appears that CGE&Y is categorizing trouble ticket disposition codes as either Qwest-caused or CLEC-caused when in fact, for reporting purposes, the choices are Qwest PID-eligible, Qwest non-PID-eligible, or non-Qwest (not necessarily indicating that the CLEC is responsible).

10xx Disposition Codes

CGE&Y's comments about troubles "referred to another department," refer to disposition code 10xx, and indicate a possible misunderstanding on the part of CGE&Y on the use of this code category. Clarification reveals that this finding and the associated recommendations are not warranted. Disposition code 10xx is used when trouble reports (i.e., trouble tickets) are referred to other service bureaus, departments, or agencies not normally involved in the LMOS repair effort. Thus, the 10xx disposition code is applied when repair activity is *not* performed on a trouble ticket. Examples of such non-repair related activity include moving drops, warm transfers to a market unit (such as for non-repair action), referrals to design services due to a misroute of the trouble (i.e., the matter should not have been routed through repair channels), referrals to security, referrals to wireless, requests for directories, etc. In sum, with the exception of code 1001 (dealing with cable cuts, which *are* counted in OP-5), trouble tickets with a 10xx disposition code represent matters that are neither Qwest nor CLEC-caused repair issues.

12xx and 13xx Disposition Codes

Regarding CGE&Y's reference to troubles "coded to 12xx or 13xx (CLEC-caused) or was not in MTAS (e.g., transferred to a non-repair related department as with voice messaging)"[10], suggest that voice mail troubles, as well as other troubles in the CLEC's network – which are *not* related to obligations under the Act – should be linked with Qwest's installation of services that are 271-related. In response, voice messaging is a deregulated enhanced service that is not appropriate to measure in relation to Qwest's obligations under the Act, just as matters related to non-Qwest

[10] Qwest/Eschelon OP-5 Data Reconciliation Report, Sec. 2.4 ¶1

network problems, such as trouble in the CPE, customer education and Carrier/Alternate Provider caused (all covered by the 12xx or 13xx disposition codes) should not be counted in OP-5 or in any other 271-related measurement.

Section 2.6. Cap Gemini addressed 11 trouble tickets as incorrectly coded to the CLEC. Qwest initially agreed with Cap Gemini's assessment on two of the Disposition Code conclusions. Qwest has further researched and analyzed the telephone numbers, and now agrees that 7 of the trouble tickets should have been coded to Qwest (Case Numbers 4, 19, 17 for May 2, Case Number 20 consisting of 2 tickets, Case Number 25 for June 4, and Case Number 41).

Of the remaining 4 tickets, two were instances of referrals to the market unit to initiate service orders (Case Number 23 for May 31, and Case Number 31) which count neither against Qwest nor Eschelon and currently count under the Service Order Accuracy – Call Center Data.

Qwest continues to dispute CGE&Y's findings for the May 22 ticket within Case Number 3 and the June 11 ticket within Case Number 25. The May 22 ticket was appropriately closed to a 12xx code, and was cleared with the CLEC. Specifically, Qwest records indicate the May 22 ticket was coded to disposition code 1230 appropriately, and thus not counted in OP-5, since the technician tested the circuit "good" at the network demarcation. Information available to Qwest indicates that the trouble report on May 22 was appropriately coded based on the repair activity results at that time. It is possible for trouble to be intermittent or masked by CPE at the time a trouble report is addressed. However, in this context, the next trouble report on May 23, Case 3, did result in repair activity at a terminal, which would be OP-5-eligible.

Qwest disagrees that the June 11 trouble report for Case Number 25 was miscoded and this resulted in inappropriate assignment to Eschelon. This trouble report was coded to disposition code 1340, Carrier/ISP referral, because Qwest advised Eschelon to have their customer call 1+ for long distance calls.

In addition to the 11 cases discussed above, CGE&Y also stated that Qwest miscoded two other tickets to Disposition Codes to Qwest trouble caused in error (Case Number 23 for June 3, and 29). Qwest agrees that Case Number 23 should have been coded to Disposition Code 1006 resulting in neither Qwest repair nor Eschelon responsibility for the trouble because a referral to the market unit was necessary to address the problem (and hence, not included in OP-5). Qwest also agrees that Case Number 29 should have resulted in an Eschelon caused trouble categorization.

CGE&Y faults Qwest's ongoing Disposition Code accuracy audits because "Qwest's current auditing practices do not avail themselves of looking at a history of multiple troubles…"(pg. 27, 2.6.4). The basis of this premise appears to be that the trouble history associated with a circuit is relevant to the ultimate Disposition Code assigned to a subsequent trouble report. This premise is flawed in that subsequent trouble tickets do not necessarily mean that the original disposition code is incorrect. For example, if during testing, the technician isolates the trouble to CPE because the customer equipment is off the hook, once that condition has been fixed, other problems may be found. In addition, if the problem is a poor quality of testing or repair by the original technician, that issue belongs in MR-7, Repair Repeat Reports, rather than OP-5 Installation Quality.

Qwest maintains that its disposition code audit process, as well as the focus on Disposition Code accuracy as part of a technician's performance review, creates awareness of the importance of accurately coding troubles, with the most accurate information available to the technicians at the time the ticket is closed. If incorrect Disposition Codes are discovered through this audit process, or during the individual technician's performance review process, a review of proper process and procedures occurs. In addition, Qwest is investigating the accuracy and reliability of its current disposition code audit process and application. Results of this investigation will be used to determine if changes need to be made to this process with increased focus on accuracy.

In summary, additional analysis by Qwest of the troubles presented in Table 2.6, Qwest agrees with CGE&Y that incorrect Disposition Codes were placed on 7 of the 11 trouble reports. Additionally, Qwest disagrees with CGE&Y's trouble cause findings for 2 of the 13 trouble reports. Qwest rejects CGE&Y's suggestion that Disposition Code accuracy may be improved by incorporating trouble history into Qwest's ongoing disposition code audits, as it goes beyond the scope of Disposition Code accuracy by including repair quality in the review. The PID MR-7, Repair Repeat Report, already appropriately measures Qwest's repair quality.

Section 7, Observation 6. Qwest's procedure for the closure of non-designed trouble tickets is the same for retail customers as it is for CLECs. The network technician attempts to contact the customer (either the retail customer or the CLEC) when the ticket is closed. If the customer cannot be reached, the technician leaves a message and closes the ticket.

Despite the fact that Qwest's process is clearly non-discriminatory, CGE&Y suggests that Qwest use the same process for non-designed tickets as it uses for designed tickets. Eschelon has made a similar request through CMP. After fully analyzing Eschelon's request, Qwest concluded that changing the process as requested simply was not feasible, and Qwest denied the CMP request.

Due to the shear volume of non-designed trouble requests, it is not practical to use the same process that Qwest uses to close designed trouble tickets. Qwest has investigated other methods of addressing Disposition Code accuracy, and has found that the potential solutions cause further network disruptions. For example, CGE&Y's proposal could significantly impact network efficiency as well as falsely inflating the time that it takes to close a repair. Qwest's process currently states that the customer is notified at closure as to what is discovered, and that the ticket is to be closed. The difficulty with an affirmative response is availability of the customer. Many tickets are closed with voicemail notification to the CLEC. In addition, the CLEC may not have dialog with the end user before closing a ticket. This is an additional piece of information that would help the technician in accurate coding. However, Qwest does not speak directly to the end user customer of a CLEC. Additional steps could negatively impact all customers. In addition, adopting CGE&Y's proposal would necessitate lengthening maintenance intervals for both CLECs and retail customers – a result that is clearly not in the public interest.

The bottom line is that Qwest's procedure for closing non-designed trouble tickets is non-discriminatory, and meets all 271 and legal requirements. Furthermore, it is the same process followed by other BOCs. CGE&Y has not

proposed a practical alternative – nor has Eschelon or any other CLEC. Qwest, therefore, declines to accept the proposal.

C. Root Cause: CGE&Y's Report Goes Beyond OP-5 and Beyond the Proper Scope of Data Reconciliation

CGE&Y's findings in Sections 3 and 4, as well as some recommendations in Section 6, come from its going beyond the PID-specified requirements of OP-5 and beyond the appropriate scope of reconciling OP-5 data. Its own recommendations for further disaggregation and expansion of the OP-5 definition, as would be necessary to cover all the issues it raises, constitute a defacto admission that this is the case.

1. Explanation and Related Report Issues

This data reconciliation involved only one CLEC, Eschelon. CGE&Y's conclusions, therefore, have limited weight, in comparison to the comprehensive OSS test that covered thousands of test transactions and dozens of scenarios carefully designed by the parties to cover important service dimensions in a way that can support valid conclusions.

CGE&Y exceeded the clear scope of its assignment in conducting data reconciliation on OP-5 results for Eschelon, which resulted in unnecessary confusion of issues. While Qwest acknowledges that the parties are interested in questions beyond OP-5, such as service order accuracy, a data reconciliation effort is not the appropriate way or place to address such issues. OP-5 clearly focuses on *installation* quality. As stated earlier, in original discussions developing the OP-5 PID, the Arizona parties even changed the proposed name of the measurement from "New Service Quality" to "New Service Installation Quality," precisely because it was clear the measurement is

focusing on installation, not ordering, quality.[11] Again, Qwest recognizes there are evident misunderstandings and other questions that go beyond this, and Qwest has addressed these, has provided data, and asserts that it will continue to address and report data on service order accuracy. But a data reconciliation of an installation quality measurement is not needed in furthering the discussions on this issue because, at minimum, Qwest has already acknowledged that OP-5 does not capture these other dimensions of quality.

That this exercise has raised questions is not the issue. Rather, the issue is whether the evidence demonstrates that OP-5 does not reasonably indicate "New Service *Installation* Quality." As this response will prove, the available evidence says otherwise.

2. Detailed Comments on Specific Issues/Recommendations.

The mere fact that recommendations were made beyond data reconciliation findings made them vulnerable to being inapplicable, out of context, or beyond CGE&Y's specific role and expertise. CGE&Y's recommendations in Sections 3, 4, 6.3 through 6.6, and 7 (observations 2 and 4) all suffer from one of these conditions, summarized as follows:

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[11] The single mention of the word, "ordering," in the OP-5 purpose statement (i.e., "Evaluates quality of *ordering* and installation of services, focusing on the percentage of average monthly new order installations that were free of trouble reports . . . " [italics added]) was left in place through this change. This was done simply to reflect the fact that, unlike any other measurement, this PID includes both orders and trouble tickets. To interpret this otherwise would be contradictory with the name change that clearly was done – and at the request of CLECs, not Qwest – to emphasize OP-5's focus on installation quality.

Section 3. Service disruptions mentioned in this section relate to instances unique to, where conversions involve two orders, rather than one – i.e., a "D" or "disconnect" order and a reconnect "N" order. This involves instances where a reported trouble is determined to have occurred prior to the technician completing the installation work. In such cases, Qwest informs the CLEC that the service order status is incomplete. A trouble ticket is not issued because the installation is not yet complete. This is specified as an allowable exclusion in the OP-5 PID (fourth exclusion bullet point).

In certain situations, neither a trouble report nor a service order is the proper resolution. Specifically, these are conversions involving, for example, line side switch translations that are not completed timely and result in out-of-service conditions until the translations are completed.

OP-5 is not intended to capture reports of troubles prior to the physical installation work being finished. OP 5 explicitly focuses on trouble reports created after installation is complete and, further, after Qwest's systems "know" the service order is complete (per the previously-discussed exclusion of such situations).

Importantly, the incidence of the type of problem during conversion orders is minimal. An analysis of Qwest's call center database information from August 2002 through September 2002 shows that ***only 0.08%*** of conversion orders experienced such an outage. Given the very small volume of conversion orders experiencing problems in the provisioning process the competitive impact of these infrequent occurrences cannot be deemed significant.

Section 4. Service Order Accuracy – Customer Affecting

None of the data cited by CGE&Y in addressing this matter were supplied to Qwest. Qwest cannot verify the accuracy of the 15 out of 70 reports, nor does Qwest agree with a calculated percentage of error based on some sub-set of orders processed. Qwest performed an analysis of Call Center ticket data to determine the extent of order writing errors based on PSON inquiries. The results reflected for the period cited by Eschelon, August 26 through September 3 2002, show there were a total of 6 out of 1211 manually issued FOCs, equating to an error rate of ***less than 0.495%***.

Section 6.3. Although (as noted in response to Section 2.3) Qwest agrees with the recommendation in Section 6.3 that repeat repair reports should not be included in OP-5, the recommendation overall is beyond CGE&Y's role and expertise in this case. Notwithstanding, Qwest is responding affirmatively to all points, both in this response and in its ongoing efforts to work with the parties to address related issues.

With respect to the specific changes suggested for OP-5, Qwest's detailed responses are as follows:

- Proposed "OP-5A": Minus repeat reports, this aligns with the current OP-5 definition. Qwest agrees that, in future refinements to OP-5 (now that the capability exists to do so) repeat reports should be excluded.
- Proposed "OP-5B": As to whether measurements should be modified to capture service disruptions on the day of installation (e.g., in OP-5, PO-20, Order Accuracy-Call Center Data, or in some other new measurement), this kind of question is typical of the iterative, ongoing

working relationship between CLECs and Qwest, and is thus the type of issue the LTPA and Performance Assurance Plan ("PAP") Six-Month Reviews is intended to address. In such a highly technical, dynamic industry, with so many variables, there will always be issues such as these to address. Nevertheless, as reported above, the incidence of such situations are so very few (0.08%), there is no basis to justify a new measurement focusing on this.

- Proposed "OP-5C": This would appear to be similar to the Service Order Accuracy – Call Center Data results that Qwest is reporting (located on the page after PO-20 in the results reports). As there are a number of ways to address manual service order accuracy, as well as a number of issues; this matter should be the topic of Long-Term PID Administration, which is now getting underway under ROC auspices. Qwest has already agreed to include this type of measurement in the discussions to find an appropriate way to measure it in the future. [12]
- Proposed "OP-5D": Because this represents a combination of other measurement elements, some of which exist and some have yet to be agreed upon, some of which have retail counterparts and some do not, and some of which might result in combining "apples and oranges," it

[12] This answers Observation 1, which also addresses the documentation associated with Qwest's Order Accuracy via Call Center reporting. Any additional documentation should be managed as part of the development of an order accuracy PID(s) through the LTPA efforts. Since, as CGE&Y recognized in Section 4, Qwest is already "including only the first call center ticket flagged as an LSR/SO mismatch even if it is not the first call center ticket opened", Qwest is not opposed to clarifying the point in a future version of the monthly results summary notes. This response also addresses Observation 5.

is premature and possibly inappropriate to settle on this kind of roll-up measurement component. However, in any event, as proposed by CGE&Y, this item cannot be fairly applied, because it has no reasonable basis for wholesale/retail comparison.

Section 6.4. The recommendation to correlate trouble reports with new installation is, as the report states, an element of what Qwest is planning to do. However, it is out of context and premature in criticizing this "fix" as limited, because the referenced data request was not covering all of the issues, so Qwest's answer was similarly limited. As explained above, in the full context, Qwest's improvements to OP-5 will, indeed, eliminate every issue mentioned in this recommendation.

Section 6.5. The recommendation to track corrections and incorporate them into measurements is necessarily limited and thus inapplicable and out of context. In any event, it would be overkill and costly. At its core, the recommendation is limited to the current approach that will be changed with Qwest's improvements. Nevertheless, again, what OP-5 *is* known to capture, in the context of extensive OSS testing, remains a reasonable indication of new service installation quality, applied the same to wholesale and retail results.

Section 6.6. While the recommendations in this section are flawed by CGE&Y's misunderstanding about disposition codes, where tickets with 10xx codes are properly excluded, and they are also out of scope, in terms of the focus of making findings and conclusions appropriate to a data reconciliation.

Section 7. Questions, as in observation 2, regarding the application of repair trip charges are not only beyond the scope of a data reconciliation on the OP-5 measurement, but also totally outside the realm of PIDs. Qwest provides a dispute

process for repair charges if the CLEC questions the charge. The opportunity to dispute repair charges is dependent on the type of service (either designed or non-designed). In either event, the dispute processes for repair charges are provided in substantially the same manner as those utilized by Qwest retail customers.

Similarly, in Observation 4, CGE&Y's suggestion that it would be helpful if Qwest would add the facility information to the CLEC order, etc., is completely outside not only data reconciliation and the PIDs, but also the TAG.

D. Root Cause: CGE&Y applies percentages in a misleading way.

1. Explanation and issues addressed

CGE&Y's report is misleading in the way it presents certain percentages, in essence, using denominators that result in implying the wrong conclusions, among other flaws. The instances where this is most significant are found in the Executive Summary, which are covered in more detail in the Section 6 conclusions and recommendations.

In Section 6.1, CGE&Y asserts that "Qwest coded 61% (51) incorrectly." That percentage, which naturally sounds large, comes from 51 tickets out of 83 that CGE&Y says are OP-5 eligible. First, this number inappropriately intermingles the issues of what OP-5 is currently defined to capture and what CGE&Y thinks it should be expanded to address. Per the Venn diagram, the 51 consists of 12 that CGE&Y says Qwest "included in error" per the Qwest's OP-5 definition and 39 that it says Qwest "excluded in error" per CGE&Y's proposal for OP-5. Thus, second, the percentage fails to consider the net effects of the errors. Third, using 83 as the denominator is meaningless, because it is out of context and only incorrectly attempts to tell part of the story. As a minimum, to indicate the extent to which there were

errors, the denominator should include both the tickets that Qwest found to be eligible *and* the tickets that were excluded correctly. Thus, instead of 51 out of 83 being processed incorrectly, it would be 51 out of 278 (i.e., 83 plus 195). Further, because OP-5 involves both trouble reports and new installation orders, an accurate, unambiguous indication of the real significance of the numbers must include both. However, the number 83 represents only the number of trouble reports. Thus, the 61% is incomplete and does not, as it might imply, represent an indication of the significance of the errors' impacts on OP-5 results.

2. Correct Evaluation of Error Impacts on OP-5 Results.

To begin with, there are two relevant perspectives in which to consider the impacts of these errors on OP-5 results. The first is what impact these errors have on what OP-5 is now reporting, based on what we know OP-5 represents, as currently reported and in light of recommendations CGE&Y and Qwest agree upon (i.e., that repeat reports are not necessary to include in properly reflecting new service installation quality, regardless of how the PID is interpreted). The other is what impact these errors would have on Qwest's pending improvement of OP-5.

Starting with the denominator, using the period CGE&Y was evaluating (May-Jun 02), there were 600 new service installation orders relevant to this reconciliation.[13] There are two categories of errors – namely, those erroneously *included* and those erroneously *excluded*. CGE&Y says these numbers are, respectively, 12 and 39. From this point, the task is to determine how many of the 39 errors should be appropriately considered to affect OP-5 results from the two

[13] Based on OP-5's denominator for Eschelon for May-Jun 02.

perspectives mentioned. The following explanations examine each factor contributing to the 39 and describe how they would impact results under the two perspectives, giving a running total leading to a conclusion at the end.

With respect to repeat reports not included, of which CGE&Y identified 9 among the 39, both CGE&Y and Qwest agree these should not be included in a new service installation quality measurement. That is, on this point, current OP-5 results are not harmed in what they purport to represent, i.e., "new order installations that were free of trouble reports . . . ."[14] Accordingly, on this factor alone, 39 reduces to 30 candidates, for purposes of representing meaningful impact on results.

With respect to orders not completed in LMOS (i.e., due to timing of orders being updated in LMOS), of the 39 tickets, CGE&Y identified 8 in this category. Qwest agrees this impacts OP-5 as currently reported, but notes that the improvement to OP-5 will eliminate this problem. Thus, under the first perspective, the number of meaningful error candidates remains at 30, while under the second perspective, it drops to 22.

Regarding errors in disposition coding, CGE&Y identifies 4 tickets of the 39 that were miscoded and not counted among the other errors. Qwest agrees with these 4 and notes that they would affect OP-5 results under both perspectives. So, the number of meaningful error candidates remain at 30 for the first perspective and 22 for the second perspective. (There were two other disposition code issues with which Qwest disagrees that were counted in the 39 under other troubles, other than repeats, which were not I-flagged, which are addressed next.)

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[14] From the purpose statement in the OP-5 PID.

Regarding other trouble reports (i.e., not identified as repeat reports above) that were not I-flagged, Qwest disagrees with two of the 9 identified among the 39 by CGE&Y. These two are explained by disposition codes that, as described above in addressing section 2.6, are properly not included in OP-5 results (Case #3 for May 22 and #25 for Jun 11). For the first perspective, this leaves 7 errors of the 9 as meaningful for evaluating impacts on results, for a decrease of 2. However, since this will be eliminated in Qwest's improvement to OP-5, this then brings the number of meaningful error candidates to 28 for the first perspective (what OP-5 now represents) and to 13 for the second perspective (the improved OP-5).

Finally, regarding the incorrect coding of some tickets as being for retail services, CGE&Y identified 9, of which 3 were related to CGE&Y's recommendation for a new OP-5B and 1 was related to CGE&Y's new OP-5C. Neither the OP-5B- nor OP-5C-related issues would impact OP-5 as it is defined today or as it will be improved (prior to other changes the parties may agree upon). While these kinds of suggestions will certainly be the topic of discussion in the future, they are not appropriately counted as OP-5 impacts today, as currently defined. This drops the number of meaningful impact error candidates by another 4 for the first perspective, leaving 24 meaningful error impacts. As Qwest's improvement to OP-5 would eliminate the problems CGE&Y observed on this factor, this drops the impacts by 9, from 13 down to just 4.

The following table summarizes these as corrections to the 39 trouble tickets identified by CGE&Y:

Category of Error	**First Perspective**: Number with Meaningful Impact on	**Second Perspective**: Number with Meaningful Impact on

	what OP-5 Results Represent Today	Improved OP-5
Repeats not included	0	0
Order not in LMOS	8	0
Disposition miscodes	4	4
Other TRs not I-flag	7	0
Misclassify as Retail	5	0
Total Impacts	**24**	**4**

The next step is to divide the meaningful error impacts individually (the 12 *included* in error, as well as the 24 tickets or 4 tickets *excluded* in error per the above table) by the number of orders in the OP-5 denominator, 600, in order to express the meaningful impact of each number on the OP-5 result.

- The first number, 12/600, is 2.0%, which represents an *understating* of OP-5 quality (since these were erroneously included tickets), under either the first or second perspectives described above.
- The second number, 24/600, is 4.0%, which represents an *overstating* of OP-5 quality under the first perspective – what OP-5 is currently known to reflect. The net effect is 4.0% minus 2.0% or only a 2.0% *overstatement* of OP-5 quality – a far cry from what 61% implied in the report.
- The third number, 4/600, is 0.67% or two-thirds of one percent, which represents a slight *overstatement* of OP-5 quality under the second perspective – what OP-5 will reflect following pending improvements. (As the improvement to OP-5 eliminates the issue related to the 12 erroneously *included*, this is the net resulting impact.)

To make matters worse, going back to the 39 tickets, CGE&Y also double counts the 39 (from the Venn diagram) by using it again in another percentage, found

in section 6.5, where it states, "of the 71 troubles CGE&Y determined were installation-related and eligible for OP-5, Qwest did not code 55% (39) of them as OP-5 eligible. Thus, in the space of three or four pages in the same section of conclusions, CGE&Y uses the same number, 39, in two different percentages, 61% and 55%, both of which seem separate and large but, in reality, represent two views of the same thing, with both having relatively small impacts on the OP-5 results.

Finally, CGE&Y's overall conclusions show that the impacts of all the questions it raises do not change the parity indication, whether using Qwest's interpretation of OP-5 or CGE&Y's. Moreover, as noted at the beginning, using CGE&Y's *proposed* OP-5A, Qwest's current reporting differs by only about one-half percent. The bottom line conclusion is that the impacts of these questions, while addressed by Qwest's pending improvements to OP-5 nevertheless are currently insignificant.

III. SUMMARY AND CONCLUSION

The questions raised by CGE&Y are explained by a very few LMOS limitations that have existed since before the development of the PIDs or by misunderstandings and overreaching on CGE&Y's part. While there are misunderstandings as to specifics of what OP-5 was intended to cover, it is clearer than ever what OP-5 does and does not capture. Regardless of whether that represents what was originally intended, CGE&Y's report confirms that OP-5 currently represents *installation* quality, not ordering quality. Outside of that, almost all of what OP-5 does not capture, in terms of service order accuracy issues, are covered by Qwest's PO-20 and Service Order Accuracy – Call Center results, and will continue to be so until the parties in the LTPA collaborative agree upon other ways to

do it. Qwest has constantly committed that it will measure these issues and work with the parties in LTPA in a good faith effort to achieve agreement on how to refine the approach. The *totality* of errors is very small (2.0 percent, as reported today, and 0.67 percent after pending improvements), and does not impact the parity decision, per CGE&Y's report.

Accordingly, it is time to move on by taking OP-5 results at face value, for what they represent, as confirmed by CGE&Y's report, by concluding the evaluation of Qwest's 271 Application in Arizona and by acknowledging that remaining refinements, in terms of further improving the measuring of new service quality – both ordering and installation – should be addressed in ongoing discussions among the parties. In doing this, the following conclusions can be reached:

- OP-5 results as currently reported represent new service *installation* quality and not ordering accuracy and, contrary to the PID, certain troubles reported on the day of installation (which errors have very small impact on OP-5 results);[15]
- The CGE&Y report shows no significant impact on parity conclusions from currently-reported OP-5 results;
- Qwest's voluntary reporting of PO-20 and Service Order Accuracy – Call Center Data covers nearly all other new service order quality issues not covered by OP-5; and
- In the above context, and in the context of the thorough OSS test, remaining issues have not been shown to prevent a meaningful

[15] *Not* including service disruptions on day of installation prior to the physical completion of the work, which OP-5 clearly excludes.

opportunity to compete and, therefore, are reasonable to address in the broader, multi-state LTPA collaborative.